

GORDON REES SCULLY MANSUKHANI, LLP
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X FILED VIA ECF

LENNY MOLINA,

Civil No.: 1:20-cv-10821-GHW

Plaintiff,

-against-

HORNBLOWER GROUP, INC., HORNBLOWER
NEW YORK, LLC and HORNBLOWER CRUISES
AND EVENTS, LLC,

Defendants.

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**NOTICE OF MOTION FOR
SUMMARY JUDGMENT AND TO
EXCLUDE ANY EXPERT
TESTIMONY AND/OR EVIDENCE**

C O U N S E L O R S:

PLEASE TAKE NOTICE, that upon the annexed Attorney Certification of Michael J. Schacher, Esq., duly sworn the 29th day of December, 2021, the exhibits annexed thereto, the Statement of Undisputed Material Facts pursuant to Local Civil Rule 56.1(a), dated December 29 2021, the Memorandum of Law, dated December 29, 2021, together with all of the pleadings and proceedings heretofore had herein, defendants, HORNBLOWER GROUP, INC., HORNBLOWER NEW YORK, LLC and HORNBLOWER CRUISES AND EVENTS, LLC, by and through their attorneys, GORDON REES SCULLY MANSUKHANI, LLP, will move this Court at the United States Courthouse located at 500 Pearl Street, Courtroom 12C, New York, New York 10007, before the Honorable Justice Gregory H. Woods, U.S.D.J., on a **return date to be set by the Court**, for an Order: 1) granting Summary Judgment and Complete Dismissal of

plaintiff's Complaint, pursuant to Rule 56 of the Federal Rules of Civil Procedure; 2) precluding and excluding any expert testimony and/or evidence offered by plaintiff at the time of trial, or in opposition to the instant motion in accordance with Individual Rule 3F and pursuant to Rules 26(a)(2)(B), 26(a)(2)(C), 26(a)(2)(D) and 37(c)(1) of the Federal Rules of Civil Procedure; together with such other, further or different relief, which this Honorable Court may deem just and proper.

Dated: Harrison, New York
December 29, 2021

Respectfully Submitted,

GORDON REES SCULLY
MANSUKHANI, LLP

By:



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File No.: EVR-1224573

Via: CM/ECF

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